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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

SINCERE ORIENT COMMERCIAL
CORPORATION, a California
corporation,

Plaintiff,

v.

CITY OF INDUSTRY, SUCCESSOR
AGENCY TO THE INDUSTRY
URBAN-DEVELOPMENT
AGENCY, California unit of local
government; FOX LUGGAGE, INC. a
California corporation; and DOES 1
through 50, inclusive,

Defendants.

CASE No.: 2:17-CV-04755-PSG-RAO

**NOTICE OF MOTION AND
MOTION TO SET ASIDE
DEFAULT PURSUANT TO
F.R.C.P. 55(C)**

Date: January 22, 2018
Time: 1:30 pm
Courtroom: Courtroom 6A

TO PLAINTIFF AND TO ITS ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on January 22, 2018 at 1:30 pm, or as soon
thereafter as counsel may be heard by the above-entitled Court, located at 350 West
1st Street, Courtroom 6A, 6th Floor, Los Angeles, California 90012-4565,
Defendant Fox Luggage, Inc. will and hereby does move the Court pursuant to Rule
55(c) of the Federal Rules of Civil Procedure to set aside the Default entered by the

1 Clerk on October 27, 2017.

2 This motion is brought on the following grounds: excusable neglect caused
3 the delay in filing an answer to plaintiff's complaint; defendant has a good and
4 meritorious defense to the claims for relief alleged; and Plaintiff will suffer no
5 prejudice.

6 This motion is based on this Notice of Motion and Motion, the Memorandum
7 of Points and Authorities filed herewith, the Declaration of Wayne Wang, and the
8 Declaration of Gary F. Wang, the Proposed Order, and upon such other matters as
9 may be presented to the Court at the time of the hearing.

10
11 Date: November 22, 2017

12 /s/Gary F. Wang

13 Gary Wang

14 Attorney for Defendant

15 Fox Luggage, Inc.